

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2020 JAN 29 PM 2:23

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UNITED STATES OF AMERICA,

v.

CATHERINE VERDON

Defendant.

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Crim. No.

(18 U.S.C. § 1001)

5:20-cr-14-1

INDICTMENT

COUNT 1

In or about April 2015, in the District of Vermont, the defendant CATHERINE VERDON, in a matter within the jurisdiction of the Social Security Administration, part of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations to the Social Security Administration during its redetermination of VERDON'S eligibility to receive Supplemental Security Income benefits, to wit, claims that she and her spouse were separated and that her spouse did not live in the household.

(18 U.S.C. § 1001(a)(2))

COUNT 2

On or about January 14, 2016, in the District of Vermont, the defendant CATHERINE VERDON, in a matter within the jurisdiction of the Social Security Administration, part of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations to the Social Security Administration during its redetermination of VERDON'S eligibility to receive Supplemental Security Income benefits, to wit, claims that as January 15, 2013 and October 6, 2015, John Verdon was not a member of the Vermont household she shared with their children.

(18 U.S.C. § 1001(a)(2))

COUNT 3

On or about August 30, 2017, in the District of Vermont, the defendant CATHERINE VERDON, in a matter within the jurisdiction of the U.S. Department of Health and Human Services and the U.S. Department of Agriculture, both parts of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in an "Application for Benefits" to the State of Vermont, by falsely claiming that she was separated from her husband; that her husband did not live in the household; and that she did not receive any money from her husband.

(18 U.S.C. § 1001(a)(2))

COUNT 4

On or about April 23, 2018, in the District of Vermont, the defendant CATHERINE VERDON, in a matter within the jurisdiction of the U.S. Department of Health and Human Services and the U.S. Department of Agriculture, both parts of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in an "Application for Benefits" to the State of Vermont, by falsely claiming that she was separated from her husband; that her husband did not live in the household; and that she did not receive any money from her husband.

(18 U.S.C. § 1001(a)(2))

A TRUE BILL

FOREPERSON

Christina E. Nolan
CHRISTINA E. NOLAN (GLW)
United States Attorney
Rutland, Vermont
January 29, 2020